

FILED

SEP 25 2023

United States District Court
Eastern District of North Carolina
Western Division

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY  DEP CLK

Case No. 5:23-CT-3275-D
(To be filled out by Clerk's Office only)

Samuel Clement Wendt

Inmate Number 1644320

(In the space above enter the full name(s) of the plaintiff(s).)

COMPLAINT

-against-

(Pro Se Prisoner)

Jamie BULLARD; TODD ISHEE; Edward

Jury Demand?

☒ Yes

Buffalo; Brandeshawn HARRIS; Wakenda Greene;

☐ No

Unit Managers: Brown, FNU; Glenda JACKSON;

Clayton BREWER; COLLINS, FNU; SHAW, FNU; et al.

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Section IV. Do not include addresses here.)

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

I. COMPLAINT

Indicate below the federal legal basis for your claim, if known. This form is designed primarily for pro se prisoners challenging the constitutionality of their conditions of confinement, claims which are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

- ☒ 42 U.S.C. § 1983 (state, county, or municipal defendants)
- ☐ Action under *Bivens v. Six Unknown Federal Narcotics Agents*, 403 U.S. 388 (1971) (federal defendants)
- ☐ Action under Federal Tort Claims Act (United States is the proper defendant; must have presented claim in writing to the appropriate Federal agency and received a notice of final denial of the claim pursuant to 28 U.S.C. § 2401(b))

II. PLAINTIFF INFORMATION

Samuel Clement Wendt

Name

1644320

Prisoner ID #

Piedmont Correctional Inst.

Place of Detention

124 S Camp Drive

Institutional Address

Salisbury

City

NC

State

28147

Zip Code

III. PRISONER STATUS

Indicate whether you are a prisoner or other confined person as follows:

- ☐ Pretrial detainee ☐ State ☐ Federal
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner

IV. DEFENDANT(S) INFORMATION

Please list the following information for each defendant. If the correct information is not provided, it could result in the delay or prevention of service. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant 1: Jamie BULLARD
Name

Warden TABOR CITY Correctional Inst. [Hereafter T.C.I.]
Current Job Title

4600 Swamp Fox Hwy 904 W
Current Work Address

Tabor City NC 28463
City State Zip Code

Capacity in which being sued: ☐ Individual ☐ Official ☒ Both

Defendant 2: TODD ISHEE
Name

Secretary - Dept of Adult Correction [Hereafter D.A.C.]
Current Job Title

NC DPS/DAC 4260 Mail Service Center
Current Work Address

Raleigh NC 27699-4260
City State Zip Code

Capacity in which being sued: ☐ Individual ☐ Official ☒ Both

Defendant(s) Continued*

Defendant 3: Edward Buffalo
Name
Secretary - Dept of public Safety [Hereafter DPS]
Current Job Title
NC-DPS 4260 Mail Service Center
Current Work Address
Raleigh NC 27699-4207
City State Zip Code

Capacity in which being sued: ☐ Individual ☐ Official ☒ Both

Defendant 4: Brandeshawn Harris
Name
Assistant Secretary - DAC
Current Job Title
4260 Mail Service Center
Current Work Address
Raleigh NC 27699-4260
City State Zip Code

Capacity in which being sued: ☐ Individual ☐ Official ☒ Both

* Please See Attachment For Additional Defendants.

Defendant 5: Wakenda Greene

TITLE: Board member/examiner

ADDRESS: 4207 Mail Service Center

Raleigh, NC 27699-4207

Capacity being sued: BOTH

Defendant 6: BROWN, FNU

Title: Green Unit Manager

Address: 4600 Swamp Fox Hwy 904W

Tabor City, NC 28463

Capacity: BOTH

Defendant 7: JACKSON, Glenda

TITLE: Assistant Unit Manager

Address: 4600 Swamp Fox Hwy 904W

Tabor City, NC 28463

Capacity: BOTH

Defendant 8: Brewer, Clayton

Title: UNIT Manager

Address: 4600 Swamp Fox Hwy 904W

Tabor City, NC 28463

Capacity: BOTH

Defendant 9: COLLINS, FNU

Title : UNIT Manager

Address: 4600 Swamp Fox Hwy 904W

Tabor City, NC 28463

Capacity: BOTH

Defendant 10: SHAW, FNU

Title : Assistant Unit Manager

Address: 4600 Swamp Fox Hwy 904W

Tabor City, NC 28463

Capacity: BOTH

Defendant 11: Bailey, Raymond

Title : Deputy Warden - Programs

Address: 4600 Swamp Fox Hwy 904W

Tabor City, NC 28463

Capacity: BOTH

Defendant 12: Baysden, FNU

TITLE : Deputy Warden

Address : 4600 Swamp Fox Hwy 904W

TABOR CITY, NC 28463

Capacity: BOTH

Defendant 13: McLaughlin, FNU

Title : UNIT MANAGER

Address: 4600 Swamp Fox Hwy 904W

Tabor City, NC 28463

Capacity: BOTH

Defendant 14: Barnhill, MARK

Title : Deputy Warden - Custody

Address: 4600 Swamp Fox Hwy 904W

Tabor City, NC 28463

Capacity: BOTH

Defendant 15: Miller, FNU

Title : Custody Officer

Address: 4600 Swamp Fox Hwy 904W

Tabor City, NC 28463

Capacity: BOTH

Defendant 16: Spivey, FNU

Title : Custody officer

Address: 4600 Swamp Fox Hwy 904 W

Tabor City, NC 28463

Capacity: BOTH

Defendant 17: Unknown Property Owners or Lease holders
of TCI

Title : Property owner/Land owner/Lease Holder

Address: 4600 SWAMP FOX HWY 904W

TABOR CITY, NC 28463

Capacity: BOTH

V. STATEMENT OF CLAIM

Place(s) of occurrence: TABOR CITY CORRECTIONAL (TCI)

Date(s) of occurrence: OCT. 17, 2020 - MARCH 16, 2023

State which of your federal constitutional or federal statutory rights have been violated:

U.S. CONST. AMD ^{8th} VIII and ^{14th} XIV; Various DPS/DAC policy violations,
NC.G.S. 148-23 (supplemental jurisdiction); NC Const AMD 19 & 27
(Supplemental Jurisdiction)

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions, state whether you were physically injured as a result of those actions, and if so, state your injury and what medical attention was provided to you.

FACTS:

Who
did what to
you?

1. From OCT 17, 2020 - March 16, 2023, Plaintiff Wendt Was
Housed at TCI. All events and occurrences outlined herein
took place at TCI during this time frame unless otherwise
specified.

2. TCI ^{STAFF} Severely restricted exercise opportunities, Social
interaction opportunities, Outside Cell time (Hereafter O.C.T.),
Used Abusive/OFFENSIVE Language, and punished Violators
of arbitrary customs/policies that the plaintiff claims
amount to Cruel and unusual punishment. (in Viol. ~~VIII~~ AMD)

3. Plaintiff also claims the way these restrictive
policies/customs were implemented violated His ^{14th} ~~XIV~~ AMD Rights
to due process.

4. Plaintiff Was threatened with an escape charge by
SGT Jacobs on or around May/June 2021 during outdoor
exercise. Plaintiff was informed TCI did not allow
inmates to Run or Jog lightly during outdoor exercise.
5. Plaintiff observed that From 21 June 2021 - FEB 2022

What happened to you?

That He, and other inmates assigned to School programs Were Not provided exercise during the school week if the outdoor exercise period occurred during school time.

Plaintiff addressed this issue with ^{Det.} Baysden and asked to receive gym time at night for make up.

Baysden Refused to open the gym for exercise and the gym at TCI Was ~~Never~~ used for exercise while the plaintiff resided at TCI.

6. Plaintiff witnessed on ~~two~~ ^{three} separate occasions the following:

SGT OWENS prevented players from playing Full court basketball outside. DFC. SPIVEY Used Offensive and abusive Language towards two inmates attempting to Jog for exercise, and Unit Manager Jackson Locked up an inmate for Exercising in the day room despite the previous five days Not being allowed outdoor exercise. These observations took place on/around NOV 22, 13 July 22, and 10 December 2022 respectively. These observations demonstrate a culture at TCI that severely restricts exercise - and punishes visitors of arbitrarily enforced unwritten policies (customs)

7. ON 7 FEB 2022, TCI implimented a highly restrictive policy without any prior Notice. This policy severely Reduced Outside Cell Time (OCT), Social interaction, environmental Stimulation, and exercise. OCT was reduced to only 3 hours per day (Locked down 21 Hours/day). Social interaction was reduced to 11 other inmates. Environmental stimulation and exercise were reduced to 3 separate one hour Sessions per week (Weather permitting and inclusive of the 3 hour OCT period and NOT exclusive of it or in addition to it. This resulted in 20 hours of OCT.

^{total}

What was
your
injury?

per week (only 2 hours on Sunday) and only 3 hours of outdoor exercise per week. Plaintiff was not allowed to exercise in the day room during OCT even if "Yardtime" was cancelled, and "Yard time" was never made up in the gym indoors - because the gym was never utilized for exercise.

8. Prior to FEB 7, 2022 OCT was 15-16 hours daily, allowed 48 inmates to socialize simultaneously, and outdoor exercise was offered every day for 1 hour/day.

9. ON the morning of FEB 7, 2022, a memo was passed under each inmates door explaining the new - highly restrictive policy being implemented immediately and without prior notice. The memo proposed these changes as temporary and due to TCI needing to "step down from Red status" Notably, the memo was unsigned and not printed on DPS/DAC Letterhead. Typically, any major policy changes must be posted 48 hours prior to implementation. This was not done, nor was any official policy ever posted despite plaintiff's repeated requests.

10. When COVID-19 Restrictions were loosened and mask requirements were lifted on 1 May, 2022 - these highly restrictive policies were not.

11. When plaintiff and other inmates asked staff members about the policies being lifted it became apparent that the staff at TCI never intended to go back to pre-7 FEB conditions. On 3 MAY 2022, Jackson used offensive and abusive language in violation of NCGS 148-23 when informing prisoners that the policy would not be rescinded. Later that same week OFC Miller also used offensive and abusive language towards plaintiff when he

VI. ADMINISTRATIVE PROCEDURES

WARNING: Prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions. 42 U.S.C. § 1997e(a). Your case may be dismissed if you have not exhausted your administrative remedies.

Have you filed a grievance concerning the facts relating to this complaint? ☒ Yes ☐ No

If no, explain why not:

Is the grievance process completed? ☒ Yes ☐ No

If no, explain why not:

VII. RELIEF

State briefly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

PLEASE SEE ATTACHED

Cited official DPS policy Chapter 0 Paragraph .0700 which outlines MODIFIED HOUSING. The exchange was witnessed by others. The enforced customs at TCI in fact exceed the policy stated above and were indefinitely enforced with no opportunity to be removed from MOD-H, Contrary to written policy.

12. Plaintiff is aware of, and therefore believes, Many other inmates also filed grievances about the Highly restrictive policy and that Nothing was done to change it.

13. Plaintiff, after getting nowhere with staff at TCI, contacted an advocacy group in late May 2022 and received a written response. In the response the Advocate contacted Defendant Ballard who admitted to the new policies/customs, showed no intention to change them, and intentionally withheld specific information (OCT, exercise, etc) citing "Security" reasons.

14. Plaintiff Filed two grievances on 30 Sep 2022 [Regarding Lockback] and 16 OCT 2022 [Regarding gym closure]. Both grievances were essentially ignored By Defendants Brewer, Barnhill, and Bailey. Defendant Greene acted as a "Rubber stamp" in her step 3 responses to both grievances. Greene only altered a few words between the two showing deliberate indifference.

15. Outdoor exercise Rotated between Yard 3 and a Concrete pad For plaintiff Wendt. While Yard 3 was adequate (despite restrictions on Running, ~~and~~ Cardio-Centric basketball and few if ever Balls),

The concrete pad was desolate. The pad was surrounded by 20' walls, open to sky, and had no equipment whatsoever. 50% of all yard calls took place on the concrete pad. Additionally, ~~concrete~~ outdoor exercise was frequently cancelled due to weather or lack of staff. Plaintiff Wendt logged the following cancelled dates:

2022 - July - 27 th , 29	2023 - Jan. - 16, 23, 25, 27, 30
AUG - 10, 12, 19, 22, 31	FEB - 1, 3, 6, 8, 10, 13, 17
Sep - 2, 28, 30	Mar - 8, 10
OCT - 12, 28	
NOV - 9, 11, 25, 30	
DEC - 5, 7, 9, 19, 21, 26	14 cancellations
22 cancelled out of 69 available	14 out of 32
TOTAL = 36 out of 101 days cancelled.	

in the ~8 month period

16. Plaintiff Wendt was promoted to medium custody on/about Sep/Oct 2022 but was told he could not be moved to medium custody because of overcrowding. Wendt remained housed in close custody until Mar 16 2023

and was subject to the same highly restrictive policies during his medium custody status despite DPS policy forbidding the mixing of custody levels. [CHAPTER F - Para. 0600 - DPS Policy]

17. Plaintiff Wendt requested the right to jog lightly during outdoor exercise. Wendt has Post Traumatic Stress Disorder from service in the U.S. Army and uses

Running as a therapeutic coping skill. Despite his promotion to medium custody, Defendant Bailey denied Wendt's ^{ADA} accommodation Request on 26 January 2023. When confronting staff about the ADA Denial Wendt was told "Prison ADA is not the same as ADA in the Real World" By ^{TCI} Social worker Bellarmy.

18. Wendt again grieved the gym being closed in Nov 2022. Defendant Bailey replied that a gym schedule was submitted, however less than two weeks later TCI elected to house (6) ~~six~~ inmates in the gym instead of using it for exercise.

19. Plaintiff contends these highly restrictive policies are not limited to TCI and pleads the Court to note that Future Joinder of additional plaintiffs from TCI is ^{Possible} ~~likely~~. Discovery will show blatant disregard for Plaintiff's Rights to Exercise, Social interaction, environmental stimulation and due process in addition to State Constitutional, Statutory, and ^{internal} policy violations. Plaintiff pleads the Court to note these policies maybe implemented statewide and thus affecting Thousands of State inmates. While Plaintiff Wendt cannot litigate on behalf of other prisoners, Wendt is none the less concerned for the alleged abuses of their Constitutional Rights, as well as his own.

20 If additional facts are required, Plaintiff pleads the Court to allow amendment of this Complaint to rectify errors/omissions.

21. Plaintiff asserts that he was infraction free from May 2021 - March 2023, and was not subject to disciplinary action during that time.

22. Plaintiff claims that the windows of his cell were ~~not~~ opaque and not clear, did not allow for viewing anything outdoors, and let in only a limited amount of light. Additionally, the lights in his cell were always on 24 hours/day with a 8 square foot light illuminated from 6am - 10pm and a smaller light illuminated from 10am - 6am. Plaintiff could not control the lights with his cell. These claims add credence to cruel & unusual punishment for constant light exposure - and lack of environmental stimulation for blocking natural light and ability to view nature from his cell.

23. Plaintiff Wendt has consequently suffered severe emotional, psychological, and physical injuries from the aforementioned lockdown procedures. Wendt claims that he has experienced weight gain, loss of energy, exacerbation of existing PTSD and Major Depressive disorder, anxiety, an increase in his prescribed mental health medication, bed sores from excessive sleep and inactivity, inability to maintain a stable blood pressure, and decreased ability to interact socially with others in an appropriate manner due to anger and frustration at TCI.

LEGAL CLAIMS:

24. Defendants BREWER, JACKSON, COLLINS, BROWN, SHAW, and McLaughlin all personally enforced and had direct knowledge of the lack of exercise, deprivation of Outside Cell Time, deprivation of environmental stimulation and deprivation of social interaction. Additionally, they all knew ^{or} ~~the~~ should have known that the policy enforced on Feb 7, 2022 was deceptively implemented, excessive in duration, more restrictive than the most restrictive policy for general population inmates, and that ~~these~~ ^{this} new policy would likely harm the inmates including Plaintiff Wendt.

25. Defendants Barnhill, Baysden, Bailey all knew or should have known that the policies they enforced would have immediate and long term risks to the inmates in their charge that would likely jeopardize the physical and mental health of all inmates, including Plaintiff Wendt. Each of the deputy wardens has years of correctional experience, were made aware of the risks, and either did nothing to prevent it (showing deliberate indifference) or willfully and maliciously perpetrated it.

26. Defendant Bullard personally stated before the Plaintiff and other members of the T.C.I. Mens Club at approx 11AM on Jan 30, 2023 that "We make close

LEGAL CLAIMS Cont:

custody hard so you want to go to medium custody and we make medium custody hard so you want to go to minimum." Plaintiff claims that this statement, along with the written exchange with holding information from an outside advocacy group, goes beyond the threshold of Deliberate Indifference and shows Bullard was fully aware of the negative impact of the new policy, and willfully and maliciously ensured its enforcement.

27. Defendant Greene acted with deliberate indifference when acting as a grievance step 3 reviewer. Greene was twice confronted with the plaintiff's grievances and had within her authority to provide appropriate relief, yet in that capacity acted as a "Rubber Stamp" by replying to both grievances with a dismissal that varied by only a few words. Claiming the grievances were resolved by prison staff when they clearly were not - showed clear indifference.

28. Defendant ISHEE and Harris both knew of the highly restrictive and constitutionally questionable policies enforced enumerated herein. They knew or should have known that as Director of Prisons/Secretary of Prisons they are ultimately responsible for the physical and mental health of N.C. inmates, including Plaintiff, and

LEGAL CLAIMS cont:

that enforcement of these policies state wide would place inmates at Risk for immediate and long term harm. By implementing and sustaining such policies they demonstrated deliberate indifference to the plaintiff's health & welfare as well as Thousands of other inmates statewide.

29. DEFENDANT Buffalo, for the reasons mentioned in [#]28, Knew or should have known that as the direct supervisor of ISHEE/HARRIS he was aware of the Highly Restrictive policy and its capacity for potential harm. If he was not made aware of this policy, then he might ~~be~~ not be fully culpable - however this would increase the culpability of ISHEE/HARRIS if they failed to inform him or withheld such information.

30. Defendants Jackson, Miller, and Spivey ~~has~~ used language in violation of N.C.G.S. 148-23. This offensive language caused plaintiff Mental strain, anger, bitterness, and depression. Plaintiff pleads the Court to exercise supplemental Jurisdiction over these State Statute violations.

31 Defendant Jackson, in addition to legal claims 24 & 30 Did act maliciously on About Dec 10, 2022 By punishing an inmate who attempted to exercise

LEGAL Claims cont:

Plaintiff personally observed this event and suffered mental strain, anger, bitterness, and depression stemming from this deprivation of a man's right to exercise himself, and punishing him for doing ^{so}.

32. Defendant Property OWNERS may be culpable in some instances if they are directly responsible for the violations of Plaintiff's Civil Rights. Plaintiff pleads the Court to allow Discovery to ascertain if such culpability exists or if the property is not privately owned or leased to the state, or qualifies as a "Municipality" for 42 USC 1983 purposes.

33. Plaintiff claims the above mentioned facts demonstrate clear violations of the plaintiff's right to be free from cruel and unusual punishment and to be provided adequate Due process. Additionally, plaintiff also claims that the facts are sufficient to support corresponding State of N.C. Constitutional violations under the 19th and 27th amendments to the NC Constitution and pleads this Court to exercise supplemental Jurisdiction over such claims. Supp. Jurisdiction is proper because the claim arises under the same set of circumstances.

34. Plaintiff alleges T.C.I. and other close custody persons continue to enforce the aforementioned policies

LEGAL CLAIMS cont:

that qualifying as a "continuing wrong," while plaintiff is no longer subjected to these policies he is ultimately concerned for the health and welfare of his fellow inmates and plees this Court to consider appropriate relief.

VII. PRAYER FOR RELIEF:

35. Plaintiff plees ~~to Grant~~ ^{this Court} to Grant a declaration that the acts and omissions described herein violated his rights under the Constitution and Laws of the United States and North Carolina, and

36. A preliminary injunction ordering an investigation into the causes of the deprivation of Plaintiff's Rights while housed at T.C.I. and to utilize the appropriate Federal agency to conduct such an investigation pursuant to 18 USC, § 3626 (1997). Plaintiff believes an investigation is proper in this instance to determine the extent of, and impact on prisoners arising from Allegations of Statewide Staff shortages resulting in overcrowding and deprivation of Civil Rights. An investigation is prudent prior to the Request for and subsequent issuance of Prospective or Appropriate Injunctive Relief, and

37. Grant Plaintiff Compensatory damages in the amount of \$20,000 against each defendant jointly and severally EXCEPT SPIVEY And MILLER, and

38. Grant Plaintiff punitive damages in the amount of \$500.00 For violation^{not} and duress caused by N.C.G.S. 148-23 Statute violation against Jackson, Miller, Spivey only.

39. Grant Plaintiff punitive damages in the amount of \$50,000 against defendants Bullard, Jackson, Bailey, Barnhill, Baysden, Ishee, Buffalo, and Harris, Greene and,

40. Grant Plaintiff appropriate compensatory and punitive damages in a yet to be determined amount against PROPERTY OWNERS, and

41. Grant Plaintiff recovery of the costs accrued in the Filing of and prosecution of this suit, and

42. any additional relief this Court deems Just, Proper, and equitable.

43. Plaintiff pleads the Court to Note that he has not received any assistance from North Carolina Prisons or Prison staff in challenging his conditions of confinement, Nor has he been provided an adequate Law Library or Word processing device by the State to aid in filing of this suit. THEREFORE, Plaintiff cannot comply with Local Rule 10 and pleads this Court to view this Complaint in the Light of these deprivations.

VIII. PRISONER'S LITIGATION HISTORY

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in forma pauperis in federal court if that prisoner has "on three or more occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28

U.S.C. §1915(g).

Have you brought any other lawsuits in state or federal court while a prisoner?

☒ Yes ☐ No

If yes, how many? 1

Number each different lawsuit below and include the following:

- Name of case (including defendants' names), court, and docket number
- Nature of claim made
- How did it end? (For example, if it was dismissed, appealed, or is still pending, explain below.)

* Wendt v. Ballard et al. (5:23-CT-3047-FL Filed East Dist NC)
Religious discrimination & Due process Rights Violation

IN PROGRESS - AWAITING Defendant Response

NOTICE TO CLERK: Plaintiff Wendt does not intend to file in forma pauperis. Once a case/docket # is assigned, Plaintiff Wendt will send the filing fee from his inmate account. Attached is the plaintiff's most recent balance statement showing available funds & his ability to pay the filing fee

IX. PLAINTIFF'S DECLARATION AND WARNING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint and provide prison identification number and prison address.

19 September 2023
Dated


Plaintiff's Signature

Samuel Clement Wendt
Printed Name

1644320
Prison Identification #

Piedmont CI
1245 CAMP Drive
Prison Address

Salisbury
City

NC
State

28147
Zip Code